

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

NILDA RIOS RIVERA

Debtor

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BANCO POPULAR DE PUERTO RICO

Movant

NILDA RIOS RIVERA  
WIGBERTO LUGO MENDER  
CHAPTER 7 TRUSTEE  
Respondents

CASE NO. 19-04116/MCF

CHAPTER 7

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF  
OF AUTOMATIC STAY, DOCKET NO. 56**

TO THE HONORABLE COURT:

**NOW COMES, NILDA RIOS RIVERA**, the Debtor through the undersigned attorney, and very respectfully states and prays as follows:

1. On March 3, 2021, Banco Popular de Puerto Rico ("BPPR"), filed a motion for relief from the automatic stay in the present bankruptcy case, Docket No. 56, alleging that the Debtor is in post-petition arrears in the mortgage loan payments to said creditor in the sum of \$15,112.53.

2. The Debtor respectfully submits that she [the Debtor] is hereby consenting to the lift of stay in favor of BPPR to allow the Debtor to meet with movant BPPR and request/apply for a mortgage loan modification through BPPR's loss mitigation division.

3. Therefore, the Debtor hereby consents to the lifting of the automatic stay in favor of BPPR. In the event the parties do not reach an agreement as to the modification/loss mitigation of BPPR's mortgage loan, the Debtor does not waive her right to be discharged of

any personal liability regarding any deficiency claim that may result from an *IN REM* foreclosure action pursued by BPPR. 11 U.S.C. Section 727(b); 11 U.S.C. Section 524(a).

**WHEREFORE**, the Debtor respectfully requests from this Honorable Court to grant the present motion consenting to BPPR’s request for the lift of stay Docket No. 56, in the above captioned Index.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system, which will send notification of same to: the Wigberto Lugo Mender, Esq., Chapter 7 Trustee; Jose J. Sanchez Velez, Esq., Counsel for BPPR; I also certify that a copy of this motion was sent via regular mail to the Debtor/respondent, Nilda Rios Rivera, Urb Paseos del Rio 269 14<sup>th</sup> Street Caguas PR 00725.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 4<sup>th</sup> day of March, 2021.

*/s/***Roberto Figueroa Carrasquillo**  
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